

Eliot T. Burriss
Texas Bar No. 24040611
Calli A. Turner
Texas Bar No. 24088558
McDermott Will & Emery LLP
2501 North Harwood Street, Suite 1900
Dallas, Texas 75201
(214) 295-8053 - tel
(972) 920-3117 – fax
eburriss@mwe.com
cturner@mwe.com
Attorneys for _____

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

REVOLUTION MONITORING, LLC

CASE NO. 18-33730-hdh

**REVOLUTION MONITORING
MANAGEMENT LLC,**

CASE NO. 18-33731-hdh

**REVOLUTION NUEROMONITORING
LLC**

CASE NO. 18-33732-hdh

Debtors.

(Jointly Administered)

**STIPULATION REGARDING MOTION FOR LIQUIDATING TRUSTEE FOR RULE
2004 EXAMINATION**

SUMMARY OF RELIEF SOUGHT

1. The Liquidating Trustee filed Motions for Rule 2004 Examinations on multiple entities in the Cigna corporate family on or about September 6, 2019.

2. The Motion seeks information regarding claims for benefits under health and welfare benefits plans that were administered or insured by certain of the Cigna entities. The information sought is voluminous and would include the production of information protected from disclosure by Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).

3. Counsel for Cigna and counsel for the Trustee are negotiating a qualified protective order that complies with HIPAA and that would enable Cigna to produce certain information in response to the subpoenas that the Liquidating Trustee seeks to serve.

4. In addition, counsel are discussing the scope of the documents to be sought with the contemplated subpoenas and mechanics for responding to the subpoenas, scope of the documents sought, and related matters.

5. Counsel for the Trustee originally requested that the Court issue and order on the Rule 2004 Motion and enter an order authorizing the issuance of the subpoenas by September 27, 2019. Counsel has agreed to extend the timeframe in which the appropriate Cigna entities may respond to the Rule 2004 examinations to September 30, 2019.

6. Accordingly, by this stipulation, the Liquidating Trustee and Cigna request that the Court defer any ruling on the Rule 2004 Motions as to the Cigna entities to September 30, 2019.

PRAYER

Liquidating Trustee and Cigna request that the Court defer any ruling on the Rule 2004 Motions as to the Cigna entities to September 30, 2019.

Respectfully submitted,

/s/ Eliot T. Burriss
Eliot T. Burriss
State Bar No. 24040611
eburriss@mwe.com
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cturner@mwe.com
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Dallas, Texas 75201
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(972) 920-3117

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on counsel of record through the CM/ECF system on September 27, 2018.

s/ Eliot T. Burriss
Eliot T. Burriss

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